10-2-85

AFFIDAVIT

I, Gerald Armstrong, declare:

1. I was a member of the Sea Organization of Scientology from 1971 through 1981. During much of that time, I worked directly for L. Ron Hubbard in a variety of positions.

2. I am familiar with the orders, policies and practices of L. Ron Hubbard including those concerned with hiding him physically to thwart attempts to have him served with summonses or subpoenas. Scientology organizations and Scientologists were used by Hubbard to achieve his concealment and the frustration of due process.

3. Hubbard had been at a secret location in Hemet in 1979 and early 1980. The exact location was known to only a few Scientologists. In or about March of 1980, he fled from that location and went into even deeper hiding, taking with him two Scientologists, Pat and Anne Broeker.

4. I was assigned at the same time to a "mission", the purpose of which was to resolve Hubbard's legal problems and to establish a series of buffer corporations which would allow him to retain control of Scientology organizations without being legally responsible for the organization's tortious or criminal acts. I learned at the start of this mission from Hubbard's communications that he fled because of his fear of being subpoenaed as

a witness in the then pending IRS tax case against Scientology in which inurement of the organization's funds to Hubbard was an issue, and that he would be served in other civil cases where he had been or would be named as a defendant. He also expressed a concern because an Oregon case, Christofferson v. Scientology, had resulted in a 2.1 million dollar judgment. All of these concerns were expressed in correspondence Hubbard sent to the mission I had been appointed to, and I saw this correspondence due to my duties in this mission. The correspondence had been sent to the mission at least a month before any attorneys were involved. I was also briefed extensively at the start of the mission on these matters, including Hubbard's fear of being served in the various cases then known about, by Laurel Sullivan, Hubbard's representative and personal public relations officer.

5. Throughout 1980 and 1981, I worked in the Personal Public Relations Office of L.Ron Hubbard and I was familiar with the shore story on where Hubbard was and what he was doing, as well as the truth of the matter. For "legal" reasons, so that service of Hubbard could not be effectuated by litigants using organization communication channels, we all were told to state and did state that we had no means of communicating to Hubbard. This was a lie because we all knew, at my level in the organization, that communications

could and did go to Hubbard via David Miscavige, a top messenger in Hubbard's messenger unit of Scientology. I received an order from Hubbard in mid-1980 to send him a copy of a particular manuscript and I was able to do so using Scientology organization communication channels.

6. The shore story was that Hubbard had gone into seclusion to research and write novels. But each of us knew that he was in hiding because of the several lawsuits in which he had been named as a defendant. In 1981, Laurel Sullivan, Hubbard's Senior Personal Public Relations Officer, briefed the Guardian's Office (GO) staff in Los Angeles, and laid out very clearly that Hubbard was hiding because of his involvement in all the lawsuits and the GO's failure to resolve his legal problems including having him removed as a defendant in the various cases. I attended this briefing which was recorded by Ms. Sullivan and the GO. No attorneys were present and Ms. Sullivan did not conduct this meeting on the advice of attorneys.

7. In mid-1981 another "legal mission" was initiated utilizing personnel from Hubbard's messenger organization. An offshoot from this mission was "Mission All Clear", the purpose of which was to remedy all Hubbard's legal problems so it would be "all clear" for Hubbard to come out

of hiding. This "legal" mission in the various Scientology organizations is still ongoing.

8. Hubbard's policies and practices to avoid legal process have formed a pattern going back many years. In December 1972, I knew that Hubbard had left the ship "Apollo," then in Portugal, and gone into hiding in the U.S. to avoid extradition to France in a fraud case then pending. In 1976, I was present in Dunedin, Florida, when Hubbard fled to avoid being served in cases being brought against the organization in Florida. In this instance, Hubbard had one of his personal staff, Joyce Popham, create the illusion that he was still in the area by forging his signature and handwriting on memos going to staff in the nearby Scientology organizations. In 1977, Hubbard fled from the Scientology base in LaQuinta, California, because of the fear that he might be named in the federal criminal case in which his wife, Mary Sue Hubbard, and 10 others were convicted of obstruction of justice. When Hubbard returned to LaQuinta, after learning from the organization legal personnel that he would not be charged in the federal case, he set up a system of guards and a radio alert so he could escape if any government agent, marshal, sheriff or process server arrived at the property. I was posted as a guard during

that period and was instructed to tell anyone who arrived and asked about Hubbard that he was not on the property. A getaway car was kept nearby for Hubbard's use at all times. Each person on the base was briefed and drilled to lie about Hubbard's presence, to refuse and kick away any papers being served by officials or process servers, and to alert others on the base so Hubbard could escape.

9. In December 1975 through May 1976, I worked in Hubbard's personal communications unit, holding the post of Deputy LRH External Communications Aide, at Dunedin, Florida. During that time, I saw Hubbard's Program, "Code Name: Power", attached hereto as Exhibit "A". I also saw various compliance reports and other correspondence concerning "Power" including "Project: Early Warning System" written by Deputy Guardian for the U.S., Henning Heldt, attached hereto as Exhibit "B". These documents show Hubbard's order to the Guardian Office to set up a warning system so he could avoid service of process, and the GO's massive operation to comply with that order.

Signed this 2nd day of October, 1985, under the pains and penalties of perjury.

Gerald Armstrong

CO ORDER 261175LRH SECRET 5205

26 Nov 75

DGUS ccCSG
ccGWW
ccPERS PFG

PROGRAM LRH SECURITY
CODE NAME: POWER

1. Maintain an alerting Early Warning System throughout the CO N/W so that any situation concerning govts or courts by reason of suits is known in adequate time to take defensive actions to suddenly raise the level on LRH personal security very high. DGUS _____

2. Begin at once to build up a USB AG office that is permanent and effective in all Bus both to take this load off LRH and CSG lines and to proof up the USB against catastrophes in any Bu. area. The USB area is the most sensitive area you now have in US or international operations and the AG office there should be commeasurate with the importance and potential threat of the existing scene. GWW, DGUS 22.3.77

3. Really attain PRAC in the GW operating area for the organizations operating there, sort out any weak spots or potential threats internal or external and handle, concentration in this target being upon the operation itself and its contacts and internal personnel. Dynamite spots should be predicted far in advance (example Non-US registration cycle which I am having to push) and handled before any repercussion occurs. DGUS 22.3.77

4. Get in a stream of reports by making the USB-GCWW reporting cycle from USB AG office very fast and positive, with this line running directly to the CO on its own N/W channels independent of LRH-CSG lines. These lines come back from GCUS and GWW to LRH-CSG, not from USB to LRH-CSG for local handling. Put a terminal in at GCUS that coordinates USB as a single-hatted action. GWW, DGUS Done 31 May

5. Develop a specific set of stats for the USB CO Office that reflect the reality of the existing scene, including every BU. DGUS Done 19.2.76

6. Push the stats into Power. GWW, DGUS _____

LRH

7/8/77 SK-48

PLAINTIFF'S EXHIBIT 1 [illegible]

GOVERNMENT EXHIBIT

United States District Court
for the District of Columbia
A TRUE COPY

JAMES F. DAVEY, CLERK

By _____ Deputy Clerk

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